

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE NEW YORK TIMES COMPANY, :

Plaintiff, :

-against- :

MICROSOFT CORPORATION, OPENAI, :
INC., OPENAI LP, OPENAI GP, LLC, :
OPENAI, LLC, OPENAI OPCO LLC, :
OPENAI GLOBAL LLC, OAI :
CORPORATION, LLC, and OPENAI :
HOLDINGS, LLC, X

Defendants.

No. 1:23-cv-11195-SHS

**AFFIDAVIT OF JOSEPH C. GRATZ IN SUPPORT OF MOTION FOR ADMISSION
PRO HAC VICE**

I, Joseph C. Gratz, declare as follows:

1. I am an attorney at law licensed to practice in the state of California. I submit this Affidavit in support of the motion to admit me pro hac vice before the United States District Court for the Southern District of New York to represent Defendants OpenAI Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC and OpenAI Holdings, LLC, in the above-captioned action.

2. I am a member of good standing in the bar of California. A true and correct copy of my certificate of good standing issued by the Supreme Court of California within the past 30 days is attached hereto.

3. Pursuant to Local Rule 1.3(c), I state:

a. I have never been convicted of a felony;

b. I have never been censured, suspended, disbarred, or denied admission or readmission by any court;

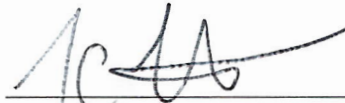
c. There are no disciplinary proceedings presently against me; and

d. I have read and am familiar with the provisions of the Judicial Code (Title 28 U.S.C.), the Federal Rules of Civil Procedure, the Federal Rules of Criminal Procedure, the Federal Rules of Evidence, the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, and the New York State Rules of Professional Conduct.

4. I will faithfully adhere to all rules applicable to conduct in connection with any activities in this Court.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: February 6, 2024



Joseph C. Gratz

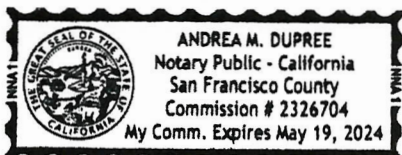
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of San Francisco

On February 6, 2024 before me Andrea M. Dupree, Notary
(insert name and title of officer)
personally appeared Joseph Charles Gratz, who
proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are
subscribed to the within instrument acknowledged to me that he/she/they executed the same in
his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the
person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the
foregoing paragraph is true and correct.

WITNESS my hand and official seal.



(Seal)

A handwritten signature in blue ink, appearing to read "Andrea M. Dupree", written over a horizontal line.

Signature of Notary